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*Attorneys for Defendant CoreCivic*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ATLP, a minor, by and through his Guardian  
Ad Litem Tyloria Taylor; and AJB, a minor,  
by and through his Guardian Ad Litem  
Tyloria Taylor, and Tyloria Taylor as Co-  
Special Administrator of the Estate of Brandon  
Lavon Patton, Deceased,

Plaintiffs,

v.

CoreCivic, Inc., formerly Corrections  
Corporation of America, a foreign corporation  
d/b/a Nevada Southern Detention Center; Doe  
CoreCivic Employees I through XX; Does I  
through X; and Roe Entities I through X,  
inclusive,

Defendants.

Case No. 2:21-cv-02072-JCM-EJY

**STIPULATION AND  
ORDER TO EXTEND DEADLINE  
FOR CORECIVIC'S REPLY IN  
SUPPORT OF MOTION FOR  
JUDGMENT ON THE  
PLEADINGS**

**(Second Request)**

Plaintiffs, Tyloria Taylor, as Co-Special Administrator of the Estate of Brandon  
Patton, ATLP, and AJB (collectively, "Plaintiffs"), and Defendant, CoreCivic, Inc.  
("Defendant"), stipulate to extend the deadline for CoreCivic to file its Reply in Support of  
Motion for Judgment on the Pleadings by one week from March 26, 2024 to April 2, 2024.

**I. Relevant Procedural History**

CoreCivic filed its Motion for Judgment on the Pleadings on February 16, 2024. (Dkt. 97.) The parties filed a Stipulation and (Proposed) Order to Extend Deadline for Plaintiffs' Response to CoreCivic's Motion for Judgment on the Pleadings and CoreCivic's Reply in Support on February 27, 2024. (Dkt. 98.) Plaintiffs requested an extension of the deadline to file their Response from March 1, 2024 to March 8, 2024, and CoreCivic requested an extension of the deadline to file its Reply to March 26, 2024, which the Court granted. (*Id.* at 1–2; Dkt. 99 at 2.) CoreCivic's current deadline to file its Reply is March 26, 2024.

**II. Good Cause Exists to Extend CoreCivic's Reply Deadline by One Week.**

Good cause exists to extend the deadline for CoreCivic to file its Reply in Support of Motion for Judgment on the Pleadings. Due to numerous conflicting deadlines in other matters, including preparing a Motion to Strike in *Militante v. CoreCivic, et al.*, No. CV-22-00352-PHX-DWL (JFM) (D. Ariz.), preparing fact and expert witness disclosure statements in *Taplin v. CoreCivic, et al.*, No. D-101-CV-2021-00896 (N.M.), preparing initial disclosures in *Cleveland v. Wellpath, et al.*, No. 1:23-CV-03180-RMR-NRN (D. Colo.), and attending multiple out-of-state depositions in *Angelo v. Wellpath, et al.*, No. 1:23-cv-01607-CNS-STV (D. Colo.), CoreCivic requires additional time to review and analyze Plaintiffs' Response and reply accordingly. CoreCivic also requires additional time for its Reply because undersigned counsel was out-of-state on a pre-planned family vacation and recently returned to the office on March 25, 2024. Good cause therefore exists to extend the deadline for CoreCivic to file its Reply in Support of Motion for Judgment on the Pleadings.

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**III. Conclusion**

For the foregoing reasons, the parties respectfully request that the Court extend the deadline for CoreCivic to file its Reply in Support of Motion for Judgment on the Pleadings by one week from March 26, 2024 to April 2, 2024.

DATED this 26<sup>th</sup> day of March 2024.

STRUCK LOVE BOJANOWSKI & ACEDO, PLC

By /s/ Kristina R. Rood

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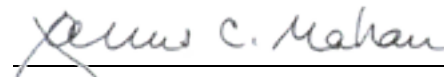
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**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: March 28, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2024, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Paola Armeni [parmeni@clarkhill.com](mailto:parmeni@clarkhill.com)  
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I hereby certify that on this same date, I served the attached document by U.S. Mail, postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

N/A

/s/ Kristina R. Rood